

**Hearing Date and Time: January 5, 2006 at 10:00 a.m.**

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*Co-counsel for Furukawa Electric North America ADP*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
	:
	: Chapter 11
DELPHI CORPORATION, <i>et al.</i> ,	:
	:
	: Case No. 05-44481 RDD
Debtors.	:
	:
	: (Jointly Administered)
	:
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**NOTICE OF MOTION OF FURUKAWA ELECTRIC NORTH AMERICA ADP  
FOR RELIEF FROM AUTOMATIC STAY TO PERMIT SETOFF OF CLAIMS**

**PLEASE THAT NOTICE** that on December 15, 2005, Furukawa Electric North America ADP ("Furukawa") filed that annexed Motion dated December 15, 2005 (the "Motion") for an order granting Furukawa relief from the automatic stay, pursuant to section 362(d) of title 11 of the United States Code (the "Bankruptcy Code"), to permit Furukawa to setoff certain mutual pre-petition claims. The Motion is scheduled for consideration by the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court, One Bowling Green, New York, NY 10004 on the next omnibus hearing date scheduled for January 5, 2006 at 10:00 a.m. (the "Hearing").

**PLEASE TAKE FURTHER NOTICE** that objections to the Motion, if any, must be filed electronically and served on the undersigned (with a copy delivered to Judge Drain's Chambers) so as to be received no later than 5:00 p.m. on December 29, 2005.

Dated: December 15, 2005  
Grand Rapids, Michigan

VARNUM, RIDDERING, SCHMIDT  
& HOWLETT LLP

By: /s/ Michael S. McElwee  
Michael S. McElwee (P36088)  
333 Bridge Street, N.W., Ste. 1700  
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(616) 336-6827

and

Dated: December 15, 2005  
New York, New York

DICONZA LAW, P.C.

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